

Christopher C. Humphrey (CH 9551)
HUMPHREY LAW, LLC
7 Lothrop Lane
P.O. Box 608
Cohasset, Massachusetts 02025
Telephone: 908-472-8999
E-Mail: chumphreylaw@gmail.com
Local Counsel for Plaintiff

Peter Strojnik, Arizona Bar No. 6464
PETER STROJNIK, P.C.
3030 North Central Avenue, Suite 1401
Phoenix, Arizona 85012
Telephone: 602-524-6602
Facsimile: 602-296-0135
E-mail: Strojnik@aol.com
Attorneys *pro hac vice* for Plaintiff

Peter K. Strojnik, Arizona Bar No. 026082, California Bar No 242728
THE STROJNIK FIRM LLC
Suite 1401, 3030 North Central Avenue
Phoenix, Arizona 85012
Telephone: 602-297-3019
e-mail: Strojnik@skplaw.com
Attorneys *pro hac vice* for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DARE INVESTMENTS, LLC, a Utah limited liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE COMPANY, a Missouri domiciled insurer; HORIZON TITLE AGENCY, Inc., a New Jersey domiciled company; CHICAGO TITLE RICO ENTERPRISE, a racketeering enterprise,

Defendants.

CIVIL ACTION NO. 10-6088

Civil Action

**APPLICATION FOR ENTRY OF
DEFAULT AGAINST HORIZON TITLE
AGENCY AND CHICAGO TITLE RICO
ENTERPRISE**

(Electronically Filed)

TO: William T. Walsh
United States District Court for
the District of New Jersey
M.L. King, Jr. Federals Bldg. & Courthouse
50 Walnut St.
Newark, NJ 07101

Application is hereby made, pursuant to Fed. R. Civ. P. 55 (a) for the Entry of Default against Defendants Horizon Title Agency, Inc. and Chicago Title Rico Enterprise for failure to plead or otherwise respond to Plaintiff's Complaint within the time and in the manner provided by the Federal Rules of Civil Procedure.

Please enter defaults against Defendants Horizon Title Agency, Inc. and Chicago Title Rico Enterprise for failure to plead or otherwise respond to Plaintiff's Complaint within the time and in the manner provided by the Federal Rules of Civil Procedure.

Plaintiff relies upon the Certification of Christopher C. Humphrey, Esq. submitted herewith in support of its Application.

HUMPHREY LAW LLC
Local Counsel for Plaintiff

By: s/ Christopher C. Humphrey

Dated: January 25, 2011

CERTIFICATION OF SERVICE

I hereby certify that on this date a true copy of Plaintiff's Application for Entry of Default and supporting documents were electronically filed with the Court and copies of same were sent via overnight delivery as follows:

Chicago Title RICO Enterprise
c/o Corporation Trust Co.
820 Bear Tavern Road
West Trenton, NJ 08628

Horizon Title Agency, Inc.
c/o Mary Anne Dutton
162 Route 24
Mendham, NJ 07945

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false that I am subject to punishment.

HUMPHREY LAW LLC
Local Counsel for Plaintiff

By: s/ Christopher C. Humphrey

Dated: January 25, 2011